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# BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, DC 20268-0001

**DSCF Standard Mail Load Leveling** 

Docket No. N2014-1

PUBLIC REPRESENTATIVE SECOND INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO UNITED STATES POSTAL SERVICE WITNESS ANDERSON (PR/USPS-T2-5-8)

(January 15, 2014)

Pursuant to Rules 25 through 28 of the Postal Regulatory Commission Rules of Practice, the Public Representative hereby submits the following interrogatories and requests for production of documents. Definitions and instructions included with the Public Representative's interrogatories PR/USPS-T1-1-10 dated January 3, 2014, are hereby incorporated by reference.

Respectfully Submitted,

/s/ Anne J. Siarnacki

Anne J. Siarnacki Public Representative for Docket No. N2014-1

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## PR/USPS-T2-5

In response to PR/USPS-T2-3, you explain that "[t]he Postal Service has begun an informal evaluation of the information received about Tuesday workloads during the South Jersey Operations Test."

- a. Please describe the Postal Service's methodology and approach to the informal evaluation.
- b. Please provide the date by which you expect the informal evaluation to be completed.
- c. If the informal evaluation has been completed, please describe the results, recommendations, and conclusions.
- d. Please describe how the Postal Service plans to implement any recommendations/changes that result from the informal evaluation.

## PR/USPS-T2-6

In response to PR/USPS-T2-3, you attached qualitative information and quantitative data received concerning Tuesday workloads during the South Jersey Operations Test.

- a. Were only selected offices chosen to provide feedback concerning the South Jersey Operations Test?
- b. If the answer to part a is in the affirmative, how were those offices selected?
- c. Please identify, describe, and provide all documents detailing any qualitative information and quantitative data resulting from the South Jersey Operations Test that concern matters other than Tuesday workloads.

#### PR/USPS-T2-7

On page A-5 of your attached response to PR/USPS-T2-3, you provide information concerning the regular hours, overtime hours, and carriers out past 17:00 for the second, third, and fourth weeks of September 2013 in Voorhees and Ocean City. Please provide the same data for the second, third, and fourth weeks of September 2012.

### PR/USPS-T2-8

Please provide workpapers detailing daily average carrier overtime hours and carriers out past 17:00 in August-October 2012 and August-October 2013 for each office that participated in the South Jersey Operations Test.